

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2022-88-T

Application of MyRide SC, LLC for Class C
 (Non-Emergency) Certificate of Public
 Convenience and Necessity for Operation of
 Motor Vehicle Carrier

**MYRIDE’S OPPOSITION TO
 INTERVENTION
 OF
 CANDACE BURCH**

MyRide SC, LLC (“MyRide”) urges the Commission deny the intervention of Candace Burch because she has not complied with the Commission’s regulations. S.C. Code Reg. 103-825(3).

BACKGROUND

MyRide applied for a Class C (Non-Emergency) Certificate of Public Convenience and Necessity on March 1, 2022. On March 10, 2022, Maria Walker filed a Letter of Protest in which she argued MyRide’s equipment is not safe. On March 14, 2022, Candace Burch filed a letter of protest urging the Commission deny MyRide’s application based on the contention that there are “more providers than necessary to serveprivate facilities and the SCDHHS state-appointed broker.” The next day, Merit Transit, LLC (“Merit Transit”), a company in which Ms. Burch is the principal officer, applied for a Class C (Non-Emergency) Certificate of Public Convenience and Necessity with statewide authority, therefore requesting to serve the same counties she claims are saturated. *See Application of Merit Transit LLC for a Class C (Non-Emergency) Certificate* Dkt No. 2022-118-T, (Application attached as Exhibit A). The Commission voted to approve Merit’s application on April 7, 2022 and issued its Order on April 19, 2022. Order 2022-230, Dkt. 2022-118-T.

MyRide responded to Ms. Burch's letter of protest on March 24, 2022. On the same day, the Commission approved a motion by Commissioner Caston to "request the Office of Regulatory Staff investigate this Application and the Letter of Protest received in this Docket." Order 2022-171. ORS responded to the Commission on April 15, 2022. Regarding Ms. Walker's protest, ORS explained it conducts a "thorough inspection of every entity that applies for a Class C (Non-Emergency) Certificate" after the Commission approves an application and it will not issue a certificate if the company fails inspection. Regarding Ms. Burch's protest, ORS said the agency "does not offer an opinion regarding the need for Class C (Non-Emergency Carriers)".

Up to this point, everyone involved—Commission, MyRide, and ORS—had treated Ms. Burch's correspondence as a letter of protest. However, on April 19, 2022, the Chief Hearing Officer issued an Order granting Ms. Burch intervenor status. Order No. 2022-37-H. After MyRide pointed to its March 24th response to Ms. Burch's letter of protest, the Chief Hearing Officer rescinded his Order granting intervention, and referred the question to the Commission. Order No. 2022-38-H.

On April 25, 2022, Scott Bagwell, the Customer Advocate/Transportation Manager for Modivcare, the sole transportation broker for non-emergency medical transportation for South Carolina's Medicaid program, wrote a letter supporting My Ride and explained that delay of the carrier's application was harming the state's citizens. On April 27, 2022, Ms. Burch filed a second letter of protest stating that she desires to "intervene and protest the letter sent by Modivcare."

DISCUSSION

1. Ms. Burch lacks standing to intervene.

Ms. Burch has failed to state a sufficient interest in this matter to justify intervention. S.C. Code Ann. Reg. 103-825(A)(3) requires that petitions to intervene "set forth clearly and concisely:

(a) [t]he facts from which the nature of the petitioner's alleged right or interest can be determined"

An intervenor must state "a legally protected interest that is either (a) concrete and particularized or (b) actual or imminent." *In re: Petition of S.C.E.&G. Co.* Order 2012-495, Dkt. 2012-203-E, p. 1.

Ms. Burch states she is the owner and principal "of a transportation company for non emergency services that serves, Horry, Georgetown, Williamsburg, Marion, Dillon, Charleston, Berkeley and Dorchester Counties." Letters of Protest, March 14, 2022, and April 25, 2022. While her transportation company may have an economic interest in stifling competition for Class C services, Ms. Burch, in her personal capacity, does not. Mere ownership in a company is not sufficient to justify intervention. *See* Order 2012-495 *supra* (in which utility shareholder was denied intervention). Also, the Rules of Civil Procedure require that "Every action shall be prosecuted in the name of the real party in interest." *SCRCP* Rule 17(a). Ms. Burch is not the real party in interest behind this intervention, her transportation company is. Therefore, Ms. Burch's petition to intervene must be denied.¹

2. Ms. Burch's petition to intervene violates the doctrine of judicial estoppel.

The Supreme Court has adopted these elements of judicial estoppel:

(1) two inconsistent positions taken by the same party or parties in privity with one another; (2) the positions must be taken in the same or related proceedings involving the same party or parties in privity with each other; (3) the party taking the position must have been successful in maintaining that position and have received some benefit; (4) the inconsistency must be part of an intentional effort to mislead the court; and (5) the two positions must be totally inconsistent.

Cothran v. Brown, 357 S.C. 210, 215-16, 592 S.E.2d 629, 632 (2004).

¹ Because Ms. Burch is acting on behalf of a company, she may not appear *pro se* under Rule 103-805.B.

Each of element of judicial estoppel is met in this case:

1) Ms. Burch took inconsistent positions before the Commission within a twenty-four-hour period regarding the restricted market that her company and MyRide desire to serve. On March 14, 2022, Ms. Burch told the Commission that the counties MyRide plans to serve “have more providers than necessary to serve the transportation and/or the ride allocation needs of all private facilities and the SCDHHS state-appointed broker.” Yet, the very next day, Ms. Burch’s company Merit Transit, applied to serve the same counties she claims are overserved. Because Class C carriers operate in a restricted market, they have the functional equivalent of privity.

2) The filings are related. They both pertain to the need for Class C non-emergency carriers, so both necessarily implicated MyRide.

3). Ms. Burch received a benefit because the Commission has voted to approve Merit’s application.

4) Ms. Burch’s filings are meant to mislead the Commission as to the need for Class C non-emergency carriers.

5) Ms. Burch’s positions are totally inconsistent: either more carriers are needed, or they are not. She cannot have it both ways (if there are too many carriers, the Commission should reconsider its approval of Merit Transportation’s application). Also, Ms. Burch cannot disavow the statements of her company, because she is acting on its behalf. *SCRCP* Rule 17.

3. Ms. Burch does not state valid grounds for intervention.

Ms. Burch’s grounds for denying MyRide’s application consist of bald assertions and vague anecdotal accounts of reductions in ride allocations. In *Welsch Moving & Storage Co. v.*

Public Service Commission, the Supreme Court reversed the Commission's denial of a motor carrier's application because it solely relied on the testimony of potential competitors. The Court explained its decision as follows:

Here, in deciding that grant of a certificate to Welch would not serve the public convenience and necessity, PSC relied exclusively upon the testimony of four licensed carriers from the midlands and upstate regions.

These carriers, potential competitors of Welch, testified that, due to a decrease in business, existing carriers were left with excess capacity to handle a greater number of moves. Additionally, one carrier testified that increased competition would cause cutbacks, resulting in less expensive but inferior quality service.

No expert testimony or statistical surveys were presented to indicate that the public convenience is being served. The carriers' testimony related primarily to concerns that increased competition would adversely affect their businesses. Although detriment to the income of existing carriers is relevant, it is not determinative and "should not in itself defeat an application for additional services (citation omitted)."

Welch Moving & Storage Co. v. Pub. Serv. Com., 301 S.C. 259, 261-62, 391 S.E.2d 556, 557 (1990)

After *Welch*, the Commission rejected the same kind of loss of income arguments advanced by Ms. Burch in a household goods moving case. *In Re: Application of McCorquodale Transfer, Inc. for a Class E Certificate*. Order 2004-331, Dkt. No. 2003-187-T. Ms. Burch seeks to oppose MyRide's application with the same evidence the Supreme Court has ruled insufficient to deny an application. She has brought no scientific and verifiable evidence to the Commission, only her stated desire to avoid competition. Her intervention should be denied for failing to state viable grounds for intervention as required by S.C. Code Reg. 103-825(3).

CONCLUSION

As Modivcare has informed the Commission, the delay caused by Ms. Burch's maneuvers "has caused a great inconvenience to Modivcare and the citizens of South Carolina because there are not enough providers in the listed areas." Letter of April 15, 2022. The Commission should reject Ms. Burch's attempt to manipulate the intervention process to stifle legitimate competition.

Respectfully submitted,

s/ Charlie Terreni

Date: April 28, 2022

Charles L.A. Terreni
TERRENI LAW FIRM, LLC
1508 Lady Street
Columbia, South Carolina 29201
Tel. (803) 771-7228
charles.terreni@terrenilaw.com
SC Bar. No. 15235

EXHIBIT A

STATE OF SOUTH CAROLINA

(Caption of Case)

Example: Application for a Class C Charter Certificate from
John Doe dba Doe's Limo

Merit Transit LLC
528 Piedmont Ave
Myrtle Beach, SC 29577

306042
BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

TRANSPORTATION COVER SHEET

DOCKET
NUMBER: 2022 - 118 - T

If this is your first time filing an application with the PSC, you will not have a Docket Number. The Commission will assign one to you. If you have filed with the Commission before, a Docket Number was assigned and should be entered above.

(Please type or print)

Submitted by: William Burch

Telephone: 843-353-0490

Address: 528 Piedmont Ave

Fax: 843-839-5060

Myrtle Beach, SC 29577

Other:

Email: rockburch@gmail.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

NATURE OF ACTION (Check all that apply)

- | | |
|---|--|
| <input type="checkbox"/> Application - Class A/A Restricted | <input type="checkbox"/> Request for Name Change on Certificate |
| <input type="checkbox"/> Application - Class C Taxi | <input type="checkbox"/> Request to Amend Scope of Authority |
| <input type="checkbox"/> Application - Class C Charter | <input type="checkbox"/> Request to Amend Tariff (rate increase, etc.) |
| <input type="checkbox"/> Application - Class C Charter Bus | <input type="checkbox"/> Request to Amend Passenger Limit |
| <input checked="" type="checkbox"/> Application - Class C Non-Emergency | <input type="checkbox"/> Request |
| <input type="checkbox"/> Application - Class C Stretcher Van | <input type="checkbox"/> Exhibit |
| <input type="checkbox"/> Application - Class E Household Goods | <input type="checkbox"/> Late-Filed Exhibit |
| <input type="checkbox"/> Application - Class E Hazardous Waste | <input type="checkbox"/> Letter |
| <input type="checkbox"/> Application | <input type="checkbox"/> Proposed Order |
| <input type="checkbox"/> Request for Extension to Comply with Order | <input type="checkbox"/> Publisher's Affidavit |
| <input type="checkbox"/> Request for Order Granting Authority to Obtain a Certificate of Public Convenience and Necessity to be Rescinded | <input type="checkbox"/> Reservation Letter |
| <input type="checkbox"/> Request for Cancellation of Certificate | <input type="checkbox"/> Response |
| <input type="checkbox"/> Request for Suspension | <input type="checkbox"/> Return to Petition |
| <input type="checkbox"/> Request for Reinstatement | <input type="checkbox"/> Other: _____ |

RECEIVED

MAR 17 2022

PSC SC
MAIL / DMS

If you have any questions about this form, please contact the PUBLIC SERVICE COMMISSION at 803-896-5100.

PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

Phone: (803) 896-5100

Fax: (803) 896-5199

APPLICATION FOR CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR
OPERATION OF MOTOR VEHICLE CARRIER

CLASS C - NON-EMERGENCY

Date: 3/17/2022

Application is hereby made for a Certificate of Public Convenience and Necessity, in accordance with the provision of S.C. Code Ann., § 58-23-10, et seq. (1976), and amendments thereto.

1.

Merit Transit LLC

Name under which business is to be conducted (corporation, partnership, or sole proprietorship, with or without trade name.)

528 Piedmont Ave, Myrtle Beach, SC 29577

Street Address of Applicant

Mailing Address of Applicant (if different from street address)

843-343-0490

Phone

843-839-5060

Fax

rockburch@gmail.com

Email Address

2. If the Applicant is an LLC or a corporation, a copy of the Certificate of Existence from the South Carolina Secretary of State and the Articles of Incorporation must be attached. (If incorporated outside of SC, attach South Carolina Secretary of State "Foreign Corporation" Certificate.)

3. Select Entity Type: (Check one)

- ☐ Individual Owner/Sole Proprietorship
☐ Partnership - List names and address of all person having an interest in the business.
☒ Corporation - List names and addresses of two principal officers.

Candace Burch

101 Split Oak Ct, Myrtle Beach, SC 29588

Applicant is financially able to furnish the services as specified in this application and submits the following statement of assets and liabilities.

Financial Statement

Applicant's assets and liabilities are as follows:

Assets:

Value of Real Estate	0
Value of Motor Vehicles	250,000
Cash on Hand	1,000
Cash in Bank	10,000
Value of Other Assets and Equipment	500,000
Total Assets	761,000

Liabilities:

Mortgage/Loan on Real Estate	
Loans Owed on Motor Vehicles	190,000
Business/Other Loans Owed	
Other Liabilities or Debts	
Total Liabilities	190,000

INSTRUCTIONS:

1. "Value of Real Estate" means the actual or estimated market value of any real property/buildings owned by the Company/Business Applying for a Certificate.
2. "Mortgage/Loan on Real Estate" means the outstanding balance on any Mortgage, Equity Line or other Loan secured by the Real Estate listed in Item 1.
3. "Value of Motor Vehicles" means the actual or fair estimated value of any moving vans, trucks or other vehicles owned by the Company/Business Applying for a Certificate.
4. "Loans Owed on Motor Vehicles" means the outstanding balance on any loans or liens on the vehicles listed in Item 3.
5. "Cash on Hand" is the total of actual cash held by the Company/Business applying for a Certificate on the day this form is filled out.
6. "Business/Other Loans Owed" means the outstanding balance on any small business loan or other unsecured loan made by a person, bank or business to the Business/Company applying for a Certificate.
7. "Cash in Bank" means the current balance in checking accounts, savings accounts or the like in the name of the Company/Business applying for a Certificate. Do not include retirement accounts or personal bank account balances.
8. "Value of Other Assets and Equipment" should include the actual or estimated value of items such as office equipment (computers/furnishings), moving equipment (hand trucks/blankets/strapping), and trailers.
9. "Other Liabilities or Debts" means specific amounts/balances which the Company/Business applying for a Certificate knows that it owes to other persons or companies; for example Franchise Fees. This does NOT include regular bills such as electricity bills, security system costs, insurance, salaries, etc.

PROPOSED RATES AND CHARGES FOR SERVICE

Proposed Rates and Charges:

Ambulatory Rates

Max Rate- \$100 pick up fee \$5.00 per mile

Wheelchair Rates

Max Rate- \$200 pick up fee \$6.00 per mile

Requested Scope of Authority: Check all counties in which you are requesting permission to operate.
You will only be allowed to operate in those counties checked below. You may request "Statewide" authority if you intend to operate in all counties in South Carolina.

- | | | | | |
|-------------------------------------|---------------------------------------|-------------------------------------|-------------------------------------|---|
| <input type="checkbox"/> Abbeville | <input type="checkbox"/> Cherokee | <input type="checkbox"/> Florence | <input type="checkbox"/> Lee | <input type="checkbox"/> Saluda |
| <input type="checkbox"/> Aiken | <input type="checkbox"/> Chester | <input type="checkbox"/> Georgetown | <input type="checkbox"/> Lexington | <input type="checkbox"/> Spartanburg |
| <input type="checkbox"/> Allendale | <input type="checkbox"/> Chesterfield | <input type="checkbox"/> Greenville | <input type="checkbox"/> Marion | <input type="checkbox"/> Sumter |
| <input type="checkbox"/> Anderson | <input type="checkbox"/> Clarendon | <input type="checkbox"/> Greenwood | <input type="checkbox"/> Marlboro | <input type="checkbox"/> Union |
| <input type="checkbox"/> Bamberg | <input type="checkbox"/> Colleton | <input type="checkbox"/> Hampton | <input type="checkbox"/> McCormick | <input type="checkbox"/> Williamsburg |
| <input type="checkbox"/> Barnwell | <input type="checkbox"/> Darlington | <input type="checkbox"/> Horry | <input type="checkbox"/> Newberry | <input type="checkbox"/> York |
| <input type="checkbox"/> Beaufort | <input type="checkbox"/> Dillon | <input type="checkbox"/> Jasper | <input type="checkbox"/> Oconee | |
| <input type="checkbox"/> Berkeley | <input type="checkbox"/> Dorchester | <input type="checkbox"/> Kershaw | <input type="checkbox"/> Orangeburg | <input checked="" type="checkbox"/> Statewide |
| <input type="checkbox"/> Calhoun | <input type="checkbox"/> Edgefield | <input type="checkbox"/> Lancaster | <input type="checkbox"/> Pickens | |
| <input type="checkbox"/> Charleston | <input type="checkbox"/> Fairfield | <input type="checkbox"/> Laurens | <input type="checkbox"/> Richland | |

DESCRIPTION OF EQUIPMENT

You are not required to own a vehicle to file an application. However, prior to being issued a certificate by ORS, you will be required to have obtained a vehicle.

Maximum Number of Passengers Vehicle is Equipped to Carry: (The number of passengers a vehicle is equipped to carry is based on the number of seatbelts in the vehicle, including the driver's seatbelt.)

☒ 1-7 Passengers, including driver

☐ 8-15 Passengers, including driver

MAKE	YEAR & MODEL	VIN#	EMPTY WEIGHT	WHEEL- CHAIR LIFT
2013	Ford Econoline E-350	1FBSS3BLXDDA27351	6432	
2014	Dodge Grand Caravan	2C4RDGBG0ER263097	4317	X

INSURANCE QUOTE**This form MUST BE COMPLETED.**

The insurance quote must be complete, listing current insurance premiums. At the discretion of the Commission, a copy of current insurance policies may be required. Do not provide a copy of insurance policies unless requested. You will not be required to purchase insurance until your application has been approved and an order has been issued by the PSC. **THIS IS ONLY A QUOTE.**

The following insurance quote is for:

Merit Transit LLC

Name of Applicant

328 Piedmont Ave, Myrtle Beach, SC 29577

Address of Applicant

Amount of Premium:

Liability Insurance \$ \$4,889.21

Jim Faulkner

The above quoted premium is for a term of 12 months.

Senior Account Executive Correll Insurance

Minimum Limits - Bodily injury and property damage limits will not be less than the following:

		Limits Quoted
Liability Combined Each Occurrence	\$ 1,000,000	\$1,000,000
Medical Payments per Person	\$ 1,000	\$1,000

Old Republic Surety Insurance (Correll Insurance Agency)

Name of Insurance Company

1066 Asheville Hwy, Spartanburg, SC 29304

Home Office Address of Company

I, the Applicant, am familiar with the Commission's Rules and Regulations relating to insurance requirements and the above quote meets the minimum insurance limits prescribed. The insurance company making this quote is authorized by the South Carolina Department of Insurance to do business in South Carolina.

NOTICE:

If you wish to self-insure your motor vehicles for liability and property damage, you must comply with S.C. Code Ann. Sections 56-9-60 and 58-23-910. For more information, contact the Department of Motor Vehicles at (803) 896-8457 or (803) 896-9903.

If you wish to apply as a self-insured for worker's compensation coverage in South Carolina you may do so with the South Carolina Workers Compensation Commission (WCC) provided that you will be able to: 1) post a surety bond or letter of credit with the WCC for a minimum of \$500,000, 2) agree to pay a yearly self-insurance tax, and 3) agree to pay an annual assessment to the South Carolina Second Injury Fund. For more information, contact the WCC Self-Insurance Division at (803) 737-5712 or on the web at www.wcc.state.sc.us/self-insurance.

Exhibit Fit, Willing, and Able (FWA)

Merit Transit LLC

Name: _____

1. Is there currently any outstanding judgments against the Applicant?

☐ Yes☒ No

If Yes, list judgements here:

2. Is Applicant familiar with all statutes and regulations, including safety regulations and governing for-hire motor carrier operations in South Carolina, and does Applicant agree to operate in compliance with these statutes and regulations?

☒ Yes☐ No

3. Is Applicant aware of the Commission's insurance requirements and the insurance premium costs associated therewith?

☒ Yes☐ No

Exhibit on Driver Qualifications

1. Applicant understands that drivers must possess at least a current American Red Cross Standard First Aid and CPR Certificate or its equivalent, and records that verify/record such training must be kept on file at the company's primary place of business within South Carolina.

☒ Yes

☐ No

2. Applicant understands that drivers must be in compliance with all OSHA regulations.

☒ Yes

☐ No

3. Applicant understands that drivers must be trained in the use of all vehicle installed safety equipment such as two-way radios, first-aid kits, fire extinguishers, and other equipment as outlined in PSC Regulations.

☒ Yes

☐ No

4. Applicant understands that drivers must be able to physically perform actions necessary to assist persons with disabilities, including wheelchair users.

☒ Yes

☐ No

5. Applicant understands that drivers must wear a professional uniform and photo identification badge that easily identifies the driver and the company for whom the driver works.

☒ Yes

☐ No

6. Applicant understands that drivers must complete twelve (12) hours of in-service training annually in the area of safety, and records that verify/record such training must be kept on file at the company's primary place of business within South Carolina.

☒ Yes

☐ No

PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
101 EXECUTIVE CENTER DRIVE, SUITE 100
COLUMBIA, SOUTH CAROLINA 29210

Applicant is familiar with the provision of S.C. Code Ann. §58-23-10, et seq. (1976), and amendments thereto, and R.103-100 through R.103-241 of the Commission's Rules and Regulations for Motor Carriers (S.C. Code Ann. Regs., 1976), and R.38-406 through R.38-503 of the Department of Public Safety's Rules and Regulations for Motor Carriers (Volume 2, S.C. Code Ann., 1976) and amendments thereto, and hereby promises compliance therewith.

S.C. Code Ann. Section 58-3-250 states, in part, that every final order of the Commission must be served by electronic service, registered or certified mail, upon the parties to the proceeding or their attorneys.

Please check the applicable box:

☒ The Applicant AGREES to receive future Commission orders related to the Applicant's authority in South Carolina through the Commission's eService System. The Applicant authorizes the Commission to serve its orders by using the e-mail address as it appears on page one of this Application. To sign up for eService notifications, please visit www.psc.sc.gov to create a My DMS account.

☐ The Applicant DOES NOT AGREE to receive future Commission orders related to the Applicant's authority in South Carolina through the Commission's eService System.

The Applicant for the Certificate of Public Convenience and Necessity as set forth in the foregoing, swear or affirm that all statements contained in the above application are true and correct.



Applicant's Signature

President

3/17/22

Title of Applicant (e.g. President, Owner, etc.)

STATE OF SOUTH CAROLINA

COUNTY OF HALEY

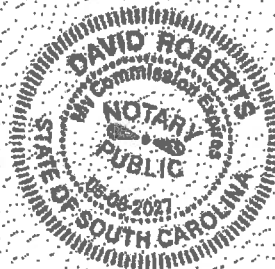
SWORN TO BEFORE ME

This 4 day of FEBRUARY, 2022

David Roberts

Notary Public

Commission Expires 05-06-2027



Filing ID: 220203-0859166

Filing Date: 02/02/2022

**STATE OF SOUTH CAROLINA
SECRETARY OF STATE**

**ARTICLES OF ORGANIZATION
Limited Liability Company - Domestic**

The undersigned delivers the following articles of organization to form a South Carolina limited liability company pursuant to S.C. Code of Laws Section 33-44-202 and Section 33-44-203:

1. The name of the limited liability company (Company ending must be included in name):

Merit Transit LLC

Note: The name of the limited liability company must contain one of the following endings: "limited liability company" or "limited company" or the abbreviation "LLC," "L.L.C.," "LC," or "L.L. Co."

2. The address of the initial designated office of the limited liability company in South Carolina is:

528 Pladmont Ave.

(Street Address)

Myrtle Beach, South Carolina 29577

(City, State, Zip Code)

3. The initial agent for service of process is:

Cardece Burch

(Name)

(Signature of Agent)

And the street address in South Carolina for this initial agent for service of process is:

528 Pladmont Ave.

(Street Address)

Myrtle Beach

(City)

South Carolina 29577

(Zip Code)

4. List the name and address of each organizer. Only one organizer is required, but you may have more than one.

(a)

Cheyenne Moseley

(Name)

101 N. Brand Blvd., 11th Floor

(Street Address)

Glendale, California 91205

(City, State, Zip Code)

Merit Transit LLC

Name of Limited Liability Company

(b)

(Name)

(Street Address)

(City, State, Zip Code)

5. ☐ Check this box only if the company is to be a term company. If the company is a term company, provide the term specified.

6. ☐ Check this box only if management of the limited liability company is vested in a manager or managers. If this company is to be managed by managers, include the name and address of each initial manager.

(a)

(Name)

(Street Address)

(City, State, Zip Code)

(b)

(Name)

(Street Address)

(City, State, Zip Code)

7. ☐ Check this box only if one or more of the members of the company are to be liable for its debts and obligations under Section 33-44-303(c). If one or more members are so liable, specify which members, and for which debts, obligations or liabilities such members are liable in their capacity as members. This provision is optional and does not have to be completed.

8. Unless a delayed effective date is specified, these articles will be effective when endorsed for filing by the Secretary of State. Specify any delayed effective date and time.

Merit Transit LLC

Name of Limited Liability Company

9. Any other provisions not consistent with law which the organizers determine to include, including any provisions that are required or are permitted to be set forth in the limited liability company operating agreement may be included on a separate attachment. Please make reference to this section if you include a separate attachment.

10. Each organizer listed under number 4 must sign.

Cheyenne Mossley

Signature of Organizer

Date: 02/02/2022

Signature of Organizer

Date:

Re: Merit Transit LLC

To Whom It May Concern:

LegalZoom.com, Inc. ("LegalZoom") as organizer of Merit Transit LLC (the "Company") appoints the following as the representative of the Company (hereafter "Representative"), pending Representative's signed acceptance, to act on behalf of the Company for the purpose of opening and maintaining accounts with banks or other financial institutions:

William Rock Burch

Furthermore, LegalZoom resigns as organizer for the Company effective upon Representative's signed acknowledgment below

Yours sincerely,

LegalZoom.com, Inc.

By: 

Cheyenne Moseley

Authorized Representative

Agreed to on: 2/1/2022

By: Camdace Burch

Name: 

FAX**Date:** 03/17/2022**Pages including cover sheet:** 17

To:	
Phone	
Fax Phone	(803) 896-5199

From:	William Rock Burch
	Merit Transport
	528 Piedmont Ave
	Myrtle Beach
	SC 29577
Phone	(843) 626-3937 * 500
Fax Phone	

NOTE:

Merit Transit LLC- Non Emergency Application

Business Entities Online

File, Search, and Retrieve Documents Electronically

Merit Transit LLC

Corporate Information

Entity Type: Limited Liability Company

Status: Good Standing

Domestic/Foreign: Domestic

Incorporated State: South Carolina

Important Dates

Effective Date: 02/02/2022

Expiration Date: N/A

Term End Date: N/A

Dissolved Date: N/A

Registered Agent

Agent: Candace Burch

Address: 528 Piedmont Ave.
Myrtle Beach, South Carolina 29577

Official Documents On File

Filing Type	Filing Date
Articles of Organization	02/02/2022

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2022-88-T
CERTIFICATE OF SERVICE

I, **CARL E. BELL**, hereby certify that I have, on this **April 28, 2022** served the **MyRide's SC, LLC OPPOSITION TO INTERVENTION of Candace M. Burch** upon the parties listed below by electronic mail and a copy of the above document by U.S. Mail today to Ms. Candace M. Burch:

Andrew M. Bateman, Counsel
Email: abateman@ors.sc.gov

David Stark, Staff Counsel
Email: David.stark@psc.sc.gov

Jeffrey M. Nelson
Email: jnelson@ors.sc.gov

David Swanner
Email: dave@myRide-SC.com

SCPSC Legal Filings
Email: legalfilings@psc.sc.gov

Candace M. Burch
Email: bigmamaburch@gmail.com

/s/ Carl E. Bell

Carl E. Bell, Paralegal
Terreni Law Firm, LLC
1508 Lady Street
Columbia, South Carolina 29201
Telephone (803) 771-7228
Fax (803) 771-8778
carlbell@terrenilaw.com

